

MEMO ENDORSED

Tim Staines
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February 11, 2020

VIA ECF

Honorable Katherine Polk Failla, U.S.J.
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, New York 10007

LETTER MOTION
TO ADJOURN
INITIAL CASE
MANAGEMENT
CONFERENCE

Re: Eric Rogers v. Mongkol Eatery, LLC, et al.
Civil Action No.: 1:19-cv-10332 (KPF)

Dear Judge Failla:

On behalf of all parties, and with their consent, I respectfully file this joint letter motion to adjourn the February 19, 2020 Initial Case Management Conference, in contemplation of a final settlement and discontinuance.

The parties have agreed to a settlement of the plaintiff's claims, the crossclaims and third-party claims. Accordingly, Rule 16 discovery is not requested. However, additional time is needed to finalize the settlement documents. Moreover, the parties anticipate that the monetary portion of the settlement will not be fully paid for six months, until September 2020.

Accordingly, the parties jointly request that the scheduled conference be adjourned for six months and that discovery be stayed in anticipation of a discontinuance to be filed before the end of September 2020.

Thank you for your attention to this matter.

Respectfully submitted,

Timothy Staines

Tim Staines (TS7130)
Raimond & Staines LLC

CC: Failla_NYSDChambers@nysd.uscourts.gov

Application GRANTED as follows. The initial pretrial conference previously scheduled for February 19, 2020 is hereby ADJOURNED *sine die*. The Court will enter an order of discontinuance which will permit the parties to reinstate the case at any time within the next 210 days, which is the functional equivalent of a stay for such amount of time.

Dated: February 12, 2020
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE